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Attorneys for Cross-Complaint

TRUSTEES OF THE MON

HOSPITALITY ASSOCIA

AND WELFARE TRUST

the Monterey County Hosp

Health and Welfare Plan)

For more information about the study, please contact Dr. Michael J. Hwang at (319) 356-4530 or via email at mhwang@uiowa.edu.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

BENJAMIN WISE, an individual,
Plaintiff,

) CASE NO. 5:18-cv-07454-LHK
) *District Judge: Hon. Lucy H. Koh*

VS.

MONTEREY COUNTY
HOSPITALITY ASSOCIATION
HEALTH AND WELFARE PLAN;
UNITED HEALTHCARE
SERVICES, INC.; MONTEREY
COUNTY HOSPITALITY
ASSOCIATION; MVI
ADMINISTRATORS INSURANCE
SOLUTIONS, INC.; MAXIMUS

**JOINT STIPULATION EXTENDING
UNITEDHEALTHCARE
INSURANCE COMPANY'S TIME
TO RESPOND TO CROSS-
COMPLAINT OF TRUSTEES OF
THE MONTEREY COUNTY
HOSPITALITY HEALTH AND
WELFARE TRUST**

1 FEDERAL SERVICES, INC.; 2 UNITEDHEALTHCARE 3 INSURANCE COMPANY; AND 4 DOES 1 THROUGH 10, 5 Defendants.	}) Complaint filed: December 11, 2018 }) Cross-Complaint filed: March 15, 2019 }) Current deadline to respond to Cross- }) Complaint: April 5, 2019 }) New deadline to respond to Cross- }) Complaint: April 26, 2019
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7 TO THE COURT:

8 The parties hereto, Cross-Defendant UNITEDHEALTHCARE
9 INSURANCE COMPANY (“UHIC”), erroneously named in the Cross-Complaint
10 as United HealthCare Services, Inc., and Cross-Complainant TRUSTEES OF THE
11 MONTEREY COUNTY HOSPITALITY ASSOCIATION HEALTH AND
12 WELFARE TRUST BENJAMIN WISE (“the Trust”) (collectively referred to as
13 “the Parties”), by and through their counsel of record, hereby stipulate as follows:

14 WHEREAS, UHIC’s current deadline to respond to the Cross-Complaint
15 is April 5, 2019;

16 WHEREAS, the Parties are currently attempting to meet and confer
17 regarding a binding arbitration clause UHIC has identified between the Parties;

18 WHEREAS, UHIC intends to file a motion to compel binding arbitration
19 in the event the Parties cannot reach a stipulation;

20 WHEREAS, UHIC and the Trust stipulate that UHIC shall have an
21 extension of time to respond to the Trust’s Cross-Complaint up to and including
22 April 26, 2019;

23 WHEREAS, Northern District of California Local Rule 6-1(a) allows
24 parties to stipulate, without Court approval, to extend the time to answer or
25 otherwise respond to the Complaint;

26 WHEREAS, this extension will not alter the date of any event or deadline
27 already fixed by Court order.

28 // /

1 IT IS SO STIPULATED.
2
3

Dated: April 5, 2019

GORDON REES SCULLY
MANSUKHANI, LLP

4
5 By: /s/ Sylvia Joo
6 Courtney C. Hill
7 Sylvia Joo
8 Attorneys for Defendant
9 UNITED HEALTHCARE
SERVICES, INC. and Cross-
Defendant UNITEDHEALTHCARE
INSURANCE COMPANY
10
11

Dated: April 5, 2019

JRG ATTORNEYS AT LAW

12 By: /s/ Stephan A. Barber
13 Stephan A. Barber
14 Paul A. Rovella
15 Attorneys for Cross-Complainant
16 TRUSTEES OF THE MONTEREY
17 COUNTY HOSPITALITY
18 ASSOCIATION HEALTH AND
19 WELFARE TRUST
20
21

ATTESTATION OF E-FILED SIGNATURE

22 I, Sylvia Joo, am the ECF user whose ID and password are being used to file this
23 Joint Stipulation Extending UnitedHealthcare Insurance Company's Time to
24 Respond to Cross-Complaint of the Trustees of the Monterey County Hospitality
25 Association Health and Welfare Trust ("the Trust"). In compliance with Local
26 Rule 5-1(i), I hereby attest that Stephan A. Barber, counsel for the Trust, has
27 concurred in this filing.

28 By: /s/ Sylvia Joo
29 Sylvia Joo
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